

Proceeding: MM Docket No's: 01-317, 00-214
Filing Date: 03/24/02
Name: Gregg E. Zuelke
Address 1: Pioneer Mobile Home Park
Address 2: 3490 Deodar Street Space 4
City: Silver Springs
State: NV
Zip Code: 89429-7300
Document Type: CO
Phone Number: 775-577-2782
Description: Email comment
Contact E-mail: zuelkege@intercomm.com

SEC. 202. BROADCAST OWNERSHIP.

(a) NATIONAL RADIO STATION OWNERSHIP RULE CHANGES REQUIRED- The Commission shall modify section 73.3555 of its regulations (47 C.F.R. 73.3555) by eliminating any provisions limiting the number of AM or FM broadcast stations which may be owned or controlled by one entity nationally.

(b) LOCAL RADIO DIVERSITY-

(1) APPLICABLE CAPS- The Commission shall revise section 73.3555(a) of its regulations (47 C.F.R. 73.3555) to provide that--

(A) in a radio market with 45 or more commercial radio stations, a party may own, operate, or control up to 8 commercial radio stations, not more than 5 of which are in the same service (AM or FM);

(B) in a radio market with between 30 and 44 (inclusive) commercial radio stations, a party may own, operate, or control up to 7 commercial radio stations, not more than 4 of which are in the same service (AM or FM);

(C) in a radio market with between 15 and 29 (inclusive) commercial radio stations, a party may own, operate, or control up to 6 commercial radio stations, not more than 4 of which are in the same service (AM or FM); and

(D) in a radio market with 14 or fewer commercial radio stations, a party may own, operate, or control up to 5 commercial radio stations, not more than 3 of which are in the same service (AM or FM), except that a party may not own, operate, or control more than 50 percent of the stations in such market.

(2) EXCEPTION- Notwithstanding any limitation authorized by this subsection, the Commission may permit a person or entity to own, operate, or control, or have a cognizable interest in, radio broadcast stations if the Commission determines that such ownership, operation, control, or interest will result in an increase in the number of radio broadcast stations in operation.

ARBITRON RATINGS:

By Company, including only stations that participated in surveys, 3 polls:

Market Rating: 127
Population: 342,500
Updated: Feb 5, 2002

| | Fa2000 | Sp2001 | Fall 2001 |
|---------------|--------|--------|-----------|
| Americom | 27.0 | 27.6 | 27.1 |
| KRNO-FM | 9.7 | 7.7 | 7.5 |
| KWNZ-FM | 7.4 | 6.7 | 6.3 |
| KODS-FM | 2.7 | 4.5 | 5.1 |
| KBZZ-AM | 0.0 | 3.0 | 3.9 |
| KLCA-FM | 4.7 | 4.9 | 3.3 |
| KPLY-AM | 2.5 | 0.8 | 1.0 |
| NextMedia | 15.2 | 15.3 | 15.1 |
| KTXH-FM | 4.1 | 5.5 | 5.3 |
| KRZQ-FM | 4.7 | 3.6 | 4.3 |
| KJZS-FM | 3.7 | 3.6 | 3.5 |
| KSRN-FM | 2.7 | 2.6 | 2.0 |
| Citadel | 23.9 | 22.0 | 24.7 |
| KKOH-AM | 8.7 | 7.9 | 9.6 |
| KBUL-FM | 7.2 | 8.3 | 5.9 |
| KWYL-FM (LMA) | 1.6 | 1.6 | 3.5 |
| KNHK-FM | 2.5 | 1.4 | 3.1 |
| KNEV-FM | 3.9 | 2.8 | 2.6 |
| Lotus | 15.6 | 16.7 | 14.5 |
| KOZZ-FM | 4.7 | 6.3 | 4.7 |
| KDOT-FM | 6.2 | 4.7 | 3.7 |

| | | | |
|-------------------|------|------|------|
| KHXR-FM | 3.7 | 4.5 | 3.1 |
| KHIT-AM | 0.4 | 0.8 | 1.6 |
| KPTT-AM | 0.6 | 0.4 | 1.4 |
| Top four totals: | 81.7 | 81.6 | 81.4 |
| Silverado | | | |
| KNVQ-FM | 0.6 | 4.1 | 3.3 |
| KPTL-AM | 0.6 | 0.0 | 0.4 |
| KXEQ-AM (Spanish) | 0.6 | 0.8 | 0.6 |
| KRNV-FM (Spanish) | 5.6 | 4.5 | 3.5 |
| Totals: | 89.1 | 91.0 | 89.2 |

Not participating in survey

KNIS-FM - Religious
 KRNG-FM - Religious
 KIHM-AM - Religious
 KQLO-AM - Spanish:
 KXTO-AM - Talk (unknown ... should have been included?????)
 KTHO-AM - (dark this whole period)
 KVLV-AM/FM - Country/AC (outside Reno, NV range by 50 miles, though readily receiveable)
 KUNR-FM - NPR/PRI (public broadcasting)
 KGVM-FM - AC (not receiveable in Reno, but only 45 miles away)
 KSVL-FM - Oldies (not receiveable in Reno, NV, no commercials anyway ... see registration note)

Other stations in California listed below may not have been a part of Nevada survey.

STATION REGISTRATION:

Stations in a roughly 100 mile radius of Reno, NV, listed by their city of registration; first by California then in Nevada, sorted by city.

Unknown when some stations consolidated, but many 'format' changes happened within roughly the last 3-4 years.

Roughly 75% of the stations listed will do 'remote' promotions and broadcasts from time to time, even stations that are primarily 24/7 network/satellite style broadcasting. "IF" the station does a better than 'average' promotion or public service, I will note it in a remark by the station listing.

KODS 103.7

ID: Carnelian Bay, CA / Reno, NV

Power: 6.3 hkw / 5.9 vkw

Owner: Americom

Co-owned: KPLY, KBZZ, KLCE, KWNZ, KRNO

History: Top 40 KHTZ ... played a WIDE variety of oldies music, local live, 24/7;

Changed to KODS 9/1998 ... narrowed variety of music but still oldies, local live, 24/7;

Moved into new studios early 2000, changed format again and started automation much of the weekdays/weekends

Oldies KODS shifted to classic hits "the River" 9/2001 and narrowed format even further

Current Format: classic hits "103.7 the River"

If you like to learn the lyrics of the "Beatles" and "Rolling Stones, this is the station to listen to.

Local Live from 6am to 10am M-F, noon-1:pm M-F, 10am-2pm Sat;

Local voice-track remaining hours weekdays/weekends

KSRN 107.7

ID: Kings Beach, CA / Reno, NV

Power: .23 kw

Owner: NextMedia Group

Co-owned: KJZS, KTHX, KRZQ

History: Has bounced around various locations since roughly 1982, with some 'off-air' time to 1992, but has remained a "classical/big-band/30s-mid-70s (with some very light 80s to current music until the current format change;
 Was moved from frequency 92.1 to 107.7 late 1998;

Current Format: (JUST CHANGED March 18, 2002): ABC Radio Networks, easy listening (see article "KSRN Changes format Monday")
(Note other station formats ... this station now sounds reasonably similar to KRNO - without groups/people such as Celeon Dion and Brittany Spears, etc., and KGVM.)
Currently 24/7 satellite broadcast other than 1 hour M-S for a local live remote broadcast; MAY put a local live 6-10am M-F.
NOTE: Consolidated Monday, March 18, 2002, in to same building as other stations owned by NextMedia.

KVMR 89.5
ID: Nevada City, CA
Power: 1.75 kw
Owner: Nevada City Communications Group
Co-owned: N/A
History: *unknown*
Current Format: Variety
NOTE: This station is unavailable in the Reno, NV area due to limited power, so it does not affect the local market.

KTHO 590
ID: South Lake Tahoe, CA
Power: 2500 w / 500 w
Owner: (Last listed as being held as a 'trustee of the courts' Sept 2001 / formerly Kidd Communications)
(Kidd Communications lost lease of land and studio due to lack of payment, went to bankruptcy)
Co-owned: N/A
History: Known from roughly 1996 to early 2001, live local talk from 6:am to 10:am and from 2:pm to 6:pm M-F
Various local automated and satellite rebroadcasts (music, talk, variety) , remaining of weekdays, weekends.
Current Format: (Satellite ... VERY similar to the MOYL satellite broadcast, such as KHIT-AM)
24/7 satellite broadcast

KOWL 1490
ID: South Lake Tahoe, CA
Power: 1000 w / 1000 w
Owner: Commonwealth License Subsidiary, LLC
Co-owned: KRLT
History: *unknown*
Current Format: News/talk "NewsTalk 1490 KOWL"
NOTE: This station is unavailable in the Reno, NV area due to limited power, so it does not affect the local market.

KRLT 93.9
ID: South Lake Tahoe, CA
Power: 3 kw
Owner: Commonwealth License Subsidiary, LLC
Co-owned: KOWL
History: *unknown*
Current Format: hot AC "the lake"
NOTE: This station is unavailable in the Reno, NV (or Carson City, NV) area due to limited power, so it does not affect the local market.

KNVQ 102.9
ID: South Lake Tahoe, CA
Power: 100 kw
Owner: Silverado Broadcasting Co., as of August 2000)
Co-owned: KPTL
History: An AC format from roughly 1994, with several callsign changes
Changed to retransmit of KPTL-AM "oldies" format early 1999
Oldies KZZF changed to hot AC KNVQ "Q102" 12/2000
Current Format: hot AC "Q102"
(If you do not like KNVQ's format, tune to KHJQ and hear the same music, only with Susanville commercials)
Live local from 6am-10am M-F.
Satellite broadcast remaining of weekdays / weekends.
NOTE: After Silverado bought station, was stated in a newspaper article that they only wanted it because of the 100 kw transmitter; within two months of owning the station (August 2000), they pulled the 'oldies' format for automation while they searched for a 'new' format to play. KHJQ was already on the air when Silverado picked up the same satellite broadcast. Within 8 months, they moved the studio to Reno, NV, firing the full Carson City staff.

KSUE 1240
ID: Susanville, CA
Power: 1000 w / 1000 w
Owner: Sierra Broadcasting Corporation
Co-owned: KJDX, KHJQ
History: *unknown*
Current Format: news/talk, Dr. Edell, G. Gordon Liddy, Troubleshooter, Jim Bohannon, Art Bell
NOTE: This station is unavailable in the Reno, NV area due to limited power, so it does not affect the local market.

KJDX 93.3

ID: Susanville, CA
Power: 100 kw
Owner: Sierra Broadcasting Corporation
Co-owned: KSUE, KHJQ
History: *unknown*
Current Format: country "93JDX"
NOTE: Though this station is [supposedly] 100 kw, the signal in the Reno, NV area is so weak that it essentially does not affect the local market.

KHJQ 102.1
ID: Susanville, CA
Power: 9.5 kw
Owner: Sierra Broadcasting Corporation
Co-owned: KSUE, KJDX
History: *unknown*
Current Format: hot AC "Q102"
NOTE: A weaker signal than KJDX, but the signal is strong enough to be heard quite well in Reno, NV.
Also note the comment of it being the same [satellite] broadcast as KNVQ ... KHJQ being the format first.

KKTO 90.5
ID: Tahoe City, CA
Power: 38 vkw
Owner: California State University
Co-owned: N/A
History: Only mid-2001 received in the Reno, NV area
Current Format: classical, NPR/PRI
Local live, various hours/days, NPR/PRI otherwise
NOTE: Often has the same programming at the same time ... sometimes a different rebroadcast time ... as KUNR.

KLCA 96.5
ID: Tahoe City, CA
Power: 6.1 kw
Owner: Americom
Co-owned: KPLY, KBZZ, KWNZ, KODS, KRNO
History: 1986 as KRZQ (country)
Changed to AC rock in 1993, live 24/7
Moved to current location early 2000.
Changed from local AC rock to "ALICE AC" early 2000
Changed calls from KRZQ to KLCA early 2000
Current Format: modern AC "Alice @ 96.5"
Local live 6am-10am M-F, "Alice AC" remaining time
Sounds VERY similar to KNEV, KWNZ and KVLV-FM

(new) 101.5
ID: Truckee, CA
Power: .14 kw
Owner: Truckee Broadcasting, Inc.
History: NEW
Current Format: *unknown*

KPTL 1300
ID: Carson City, NV
Power: 5000 w / 500 w
Owner: Silverado Broadcasting
Co-owned: KNVQ
History: Live 5am - 9am, noon-1pm and 3-7pm M-F through August 2000
Format pulled to 'local automated' after Silverado purchased station, then changed to 24/7 'satellite' broadcast.
Occasionally has a local show and will broadcast local school sports games.
Current Format: 50s - 70s oldies
NOTE: Used to do quite a lot of local interest shows and sponsor charities and events until Silverado purchased.
Carson City office rarely open unless someone doing maintenance or doing the rare local broadcast. Most commercials added by and programming done from the Reno, NV office.

KNIS 91.3
ID: Carson City, NV
Power: 67 kw
Owner: Western Inspirational Broadcasters
Co-owned: N/A
History: Has been the same, other than a change from the "Family Radio Network" to "Pilgrim Radio", as long as I have known the station.
Format: contemporary Christian, religious (no commercials)
Mixed local live and satellite broadcasting
Live local from 6am to 10am M-F, local news throughout the day, local church broadcasts, local 'taped' shows

KWNZ 97.3

ID: Carson City / Reno, NV

Power: 87 kw

Owner: Americom

Co-owned: KPLY, KBZZ, KCLA, KODS, KRNO

History: Purchased frequency 97.3 from KKBC-FM [oldies] (Carson City) in 1991.

Has remained basic format since, live 24/7 until early 2000.

Unknown when station purchased by Americom, but moved to current studios early 2000

Current Format: dance top 40 "97.3 K-Wins"

Live local from 6am-10am M-F

Local voice-track remaining hours weekdays / weekends.

NOTE: as stated, similar format to KNEV, KLCA and KVLV-FM

KBUL 98.1

ID: Carson City / Reno, NV

Power: 74 hkW / 72 vkW

Owner: Citadel Broadcasting

Co-owned: KKOI, KNHK, KNEV LMA: controls KWYL, KBDB

History: Current format for at least 10 years

Unknown when bought out by Citadel, but only within last 8 years

Current Format: country "K-Bull 98FM"

Live local 6am - 7pm M-F

Local voice-tracked remaining hours weekdays / weekends

KVLV 98.0

ID: Fallon, NV

Power: 5000 w

Owner: Lahontan Valley Broadcasting Co., LLC

Co-owned: KVLV-FM

History: has been country format for roughly 30 years

Current Format: country

Local Live 5am - 7pm M-F

Satellite country much of the remaining hours weekdays / weekends

Quite a bit of local Fallon involvement and broadcasts throughout the weekdays and some on weekends.

KVLV 99.3

ID: Fallon, NV

Power: 3.7 hkW

Owner: Lahontan Valley Broadcasting Co., LLC

Co-owned: KVLV-AM

History: Was a rebroadcast of KVLV-AM until roughly 1996.

Changed format to current mid-1996

Current Format: JRN - hot AC

Satellite broadcast 24/7

NOTE: VERY weak, signal in the Reno, NV area, essentially does not affect the local market

Similar format to KNEV, KLCA and KWNZ

KRNG 101.3

ID: Fallon / Reno, NV

Power: 1.65 kw

Owner: Sierra Nevada Christian Music Associates, Inc.

Co-owned: N/A

History: Online for roughly 2 years

Current Format: Christian Rock "Renegade Radio", quite hard 'Christian rock' (no commercials)

It has quite a few 'special interest' shows, but essentially is local live 24/7

KGVM 99.1

ID: Gardnerville / Minden, NV

Power: 3 kw DA

Owner: Carson Valley Radio, Inc.

Co-owned: N/A

History:

Current Format: AC

NOTE: Similar format as KRNO and KSRN

Signal weak enough that it essentially doesn't affect the Reno, NV market, but does reach into the Carson City, NV market.

KTHX 100.1

ID: Incline Village / Reno, NV

Power: .82 kw

Owner: NextMedia Group

Co-owned: KJZS, KRZQ, KSRN

History: Had been essentially the same format from 1988 to early 2000

Unknown when purchased by NextMedia, but moved to current studios early 2000

(NOTE: CP moved registration to Dayton, NV, and increased power to 12.2 kw)

Calls have been on frequencies 94.7, 101.7, 100.9 and now at 100.1

Current Format: AAA "100.1 the X"

Local Live from 6:am to 7:pm M-F, local voice-track remaining hours weekdays / weekends

NOTE: Used to be the one station in the Reno, NV area that would go to a local bar or dance hall or such and re-broadcast 'live music' bands, as well as searching for 'amateur' music albums and CD's to play on the air. Had a "WIDE" range of music from 'alternative' to AC, to regular rock, to easy listening, to [a touch of] country, to oldies to instrumentals to ????????????

After NextMedia bought out and moved to current location, is still a reasonably wide range, but most of the music now sounds the same in beat and content.

KRNO 106.9

ID: Incline Village / Reno, NV

Power: 35 kw

Owner: Americom

Co-owned: KPLY, KBZZ, KLCA, KWNZ, KODS

History: Played 'light soft music of mid-70s to current, of a decently wide variety

Used to be live 24/7 until early 2000, when moved to current studios

Current Format: soft AC "Sunny 106.9"

Still plays a similar [era] range of music, but has narrowed the actual selection of music played

Local Live from 6am - 10am M-F, local voice-track remaining hours weekdays/weekends

NOTE: Similar to KSRN (but WITH Celeon Dion and Brittany Spears, etc.), and KGVM

KPTT 630

ID: Reno, NV

Power: 5000 w / 1000 w

Owner: Lotus Communications

Co-owned: KHIT, KXHR, KDOT, KOZZ

History: Was KKOH (Citadel) until roughly 1992

Purchased by Lotus 1992

Kept "talk format" (on liberal side of spectrum) until Oct 2001

Picked up sports radio when KPLY changed formats Oct 2001 to 'talk radio'

Current Format: sports radio

Satellite broadcasts essentially 24/7, sometimes does a local sports broadcast

KKOH 780

ID: Reno, NV

Power: 50,000 w / 50,000 w

Owner: Citadel Broadcasting

Co-owned: KNHK, KBUL, KNEV LMA: controls KWYL, KBDB

History: *unknown prior to becoming KKOH*

KKOH has been essentially "talk radio" at whatever frequency they've owned for almost 70 years

Current Format: news/talk "News Radio 780 KOH" (on the conservative side of spectrum)

Local Live 5am-9:am, 3pm-6pm M-F

Various local shows Sat 8am-12:30pm & Sun 8am-11am, however, times vary depending on situation

NOTE: This station's weekend "news and talk" programs seem to change weekly to monthly at times. (Note article "How IRA HANSEN GOT THE BOOT".) Citadel does not like if someone speaks out opposite of what the station management's opinion, even with the disclaimer, "Opinions ... not necessarily of this station or corporation" As well, many evening and weekend afternoon/night national formats seem to change after each Arbitron survey. It is hard to keep up with the changes anymore, in my opinion.

KIHM 920

ID: Reno, NV

Power: 4600 w / 850 w

Owner: Immaculate Heart Radio

Co-owned: KQLO

History: Was KOLO radio, older to current music to 1992

Unknown purchaser, but changed to "Spanish radio in 1992, changed calls to KQLO

Sold to Immaculate Heart Radio early 2001

Changed to current format in early 2001 and changed calls about the same time to KIHM,

Current Format: Catholic Religious

Unknown how much local live, but does do quite a bit of local interest, including a Sunday sermon from local churches

No commercials

KPLY 1230

ID: Reno, NV

Power: 820 w / 820 w

Owner: Americom

Co-owned: KBZZ, KLCA, KWNZ, KODS, KRNO

History: To early 1991, was Live Local "top-40" (50s to current) 24/7

Changed to 24/7 satellite broadcasts (similar to MOYL format and the current format on KTHO, but did dig to the early 40s tunes too)

Moved to current studios early 2000

Changed from MOYL [style] format to current Sports format late 2001

Changed calls from KCBQ to KPLY late 2001

Current Format: SN-sports "K-Play"

Mostly satellite broadcast 24/7, some local sports broadcasts if requested by public relations of place

KXEQ 1340

ID: Reno, NV

Power: 977 w / 977 w

Owner: Azteca Broadcasting Corp.

Co-owned: N/A

History: *unknown*

Current Format: Spanish top 40

Unknown how much local live, local voice track and/or satellite programming

KHIT 1450

ID: Reno, NV

Power: 1000 w / 1000 w

Owner: Lotus Communications

Co-owned: KPTT, KHXK, KDOT, KOZZ

History: Simulcasted KHTZ-FM country to roughly 1995

Changed format to Sports Radio in 1995

Changed formats to MOYL in Oct 2001, taking over from KPLY (Americom) when KPLY changed formats to talk radio

Current Format: JRN MOYL - standards

Satellite broadcast 24/7, but does have hourly newscasts from local live

Some local 'interest' topics as well on weekends

KXTO 1550

ID: Reno, NV

Power: 2500 w / 94 w

Owner: Fidelity Broadcasting of Nevada, Inc.

Co-owned: N/A

History: *unknown*

Current Format: Talk

Promotes themselves as "GAY-B.C." as most of the talk is from the gay community.

National / Network / Local live throughout the broadcasts.

Unknown how much is local live, local voice-track, satellite service.

(Personal opinion, for the few times I've listened to the station as the signal does not reach the area I live in, the information produced by this group is more broad and non-political than any other [local talk/news] station I've heard so far.)

KUNR 88.7

ID: Reno, NV

Power: 20 kw

Owner: University of Nevada, Reno

Co-owned: (TV station KNPB-5)

History: Has been the same for at least 20 years

Current Format: NPR/PRI, classical, jazz

Intermixed live local and network broadcast throughout the day, no set hours for local specific broadcast M-F (IE 6am-10am M-F)

Some local programs produced on weekends inbetween various network broadcasts

KNHK 92.9

ID: Reno, NV

Power: 45 kw

Owner: Citadel Broadcasting

Co-owned: KKOI, KBUL, KNEV LMA: controls KWYL, KBDB

History: Purchased frequency in 1994, changed calls to KNHK ... (I do not remember calls or format prior to this)

Moved to current location in 1996

Format essentially the same since 1996, but has narrowed the 'music selection' over the last 3 years "THE HAWK"

Was Local Live 24/7 until 1996

Local Live 6am - 11pm M-F, to early 2001, local voice-track rest of hours weeknights / weekends

Current Format: classic rock, Bob & Tom, "Rock that Rocks You"

Changed to Local Live 6am - 10am and 3pm to 7pm, narrowed format further late 2001 "Rock that Rocks You"

Voice-track rest of hours weeknights / weekends

(Should you want to know the words to all of the AC/DC and Rolling Stones albums, this is the station to listen to the format music is that narrow.)

KNEV 95.5

ID: Reno, NV

Power: 60 kw

Owner: Citadel Broadcasting
Co-owned: KKO, KNHK, KBUL LMA: controls KWYL, KBDB
History: Moved to current location in 1996
Music essentially the same since 1996, but has narrowed over the last three years "MAGIC 95.5"
Was Local Live 24/7 until 1996
Live Local 6am to 7pm M-F to early 2001, local voice-track rest of hours weeknights / weekends
Current Format: top 40 "Mix 95.5, Today's Hit Music"
Changed to Local Live 6am to 10am M-F, narrowed format further early 2002 "MIX 95.5"
Voice-track rest of hours weeknights / weekends

KRNV 101.7
ID: Reno, NV
Power: 5 kw
Owner: Entravision
Co-owned: KNVV-LP, KNCV-LP
History: *do not remember prior to roughly 1992*
Picked up by KTHX late 1992
Changed to KRNV news talk / jazz, August 1994
Talk/Jazz KRNV-FM changed to regional Mexican 12-1999
Current Format: EVC regional Mexican "Radio Tricolor", unknown exact change date
Unknown how much local live or network broadcasting

KDOT 104.5
ID: Reno, NV
Power: 25 kw
Owner: Lotus Communications
Co-owned: KPTT, KHIT, KHX, KOZZ
History: Was KHTZ country until roughly 1995
Changed calls to KDOT and format to "pure rock" in 1995
Format: rock "Pure Rock 104.5"
As far as known, is Local Live 24/7, with only a few 'program specials' (as many stations have done over the years)

KOZZ 105.7
ID: Reno, NV
Power: 25 kw
Owner: Lotus Communications
Co-owned: KPTT, KHIT, KHX, KDOT
History: Though some songs have been 'weeded out' over the years, the format has pretty much remained the same for over 20 years,
just adding songs as the years have gone on.
Current Format: classic rock
Essentially Local Live 24/7, with just a few 'program specials' (such as Dr. Demento; Blues Hour, etc.,).
A lot of local interaction between contests, call-in for music requests, etc.
Just about ever song they can play from Phil Collins, U-2, Pink Floyd, Rolling Stones (the narrowed format), except from the
7pm- midnight M-F, which 7pm-11pm is somewhat album oriented, the last hour the 'specials'.
NOTE: This station probably does the most in the way of public service information promotions of any station in Reno, NV., however
even this station has seemed to cut down on as much as they used to do over the last year or so.

KSVL 92.3
ID: Smith Valley, NV
Power: .49 kw
Owner: Donegal Enterprises
Co-owned: N/A
History: Same since it came on line in late 1999
Current Format: 50s - 70s oldies rock
VERY INTERESTING format: 7 songs and the "ID", 7 songs and the "ID, 7 songs and the "ID". No commercials, disc jockeies or
anything else. (Sounds like he is using an old AudioVault system, no audio processing, or anything else either.)
Is owned by a co-owner of a local casino ... this is as if a 'hobby' that the owner just put up so to say he owns a radio station.

KBZZ 1270
ID: Sparks, NV
Power: 5000 w / 5000 w
Owner: Americom
Co-owned: KPLY, KLCA, KWNZ, KODS, KRNO
History: Sports radio for many years, mostly network but often local sports broadcasts as well
Moved to current studios early 2000
Changed format to talk late 2001
Changed calls from KPLY to KBZZ late 2001
Current Format: talk, Howard Stern "the Buzz"
Local Live only 10am to noon, M-F
Satellite broadcasts rest of hours weeknights
REBROADCASTS of weekday programs on weekends, no original materials

NOTE: This is a very controversial ... but in my opinion ... very interesting and entertaining station. It includes broadcasts from “Howard Stern”, The “Don and Mike Show” and “Tom Leykis”, all who have been fined by the FCC for content. Almost NO politics at least, which does make this a VERY UNIQUE station.

KBDB 1400

ID: Sparks, NV

Power: 600 w / 600 w

Owner: Flinn Broadcasting (currently LMA'd to Citadel Broadcasting)

Co-owned: KWYL (currently LMA'd to Citadel Broadcasting)

History: (new)

Current Format: (new) ... not known if it is operational yet as I am unable to tune them in at this time

KJZS 92.1

ID: Sparks / Reno, NV

Power: 4.1 kw

Owner: NextMedia Group

Co-owned: KTHX, KRZQ, KSRN

History: KSRN from roughly 1992 to 2000, big-band/classic/30s - 70's style music

Changed format late 1998 to “Smooth Jazz KSRN” ... KSRN format moved to 107.7 same time

Moved to current studios early 2000

Changed calls to KJZS 6-28-2000

Current Format: smooth jazz “Smooth Jazz 92.1”

Local Live from 6am - 1pm M-F

Local voice-track remaining hours weekdays / weekends

NOTE: CP to increase power to 9 kw submitted.

KRZQ 100.9

ID: Sparks / Reno, NV

Power: 6 kw

Owner: NextMedia Group

Co-owned: KJZS, KTHX, KSRN

History: Local AC format to “ALICE AC” format early 1998

Moved to current studio early 2000

Changed from “ALICE AC” format to “modern rock” early 2002

Changed calls from KLCA to KRZQ early 2000

Current Format: modern rock

[Sacramento affiliate] Live 5am - 10am, with a lot of interactive talk / toll-free # to Reno, NV

Local voice-track remaining of hours weekdays / weekends

KQLO 1590

ID: Sun Valley, NV

Power: 5000 w / 67 w

Owner: Thomas Aquinos School

Co-owned: KIHM

History: unknown before roughly 1995

Religious format KIHM to early 2001

Changed format early 2001 to Spanish AC

Changed calls to KQLO early 2001

Current Format: Spanish AC

Unknown if local live, voice track or network

KWYL 93.7

ID: Sun Valley / Reno, NV

Power: 3.6 kw DA

Owner: Flinn Broadcasting (currently LMA'd to Citadel Broadcasting)

Co-owned: KBDB (currently LMA'd to Citadel Broadcasting)

History: Country KATG changed to rhythmic oldies “93.7 the groove” 4-2000

Rhythmic oldies KATG changed calls to KGVN “the groove” 6-13-2000

Rhythmic oldies KGVN changed to dance top 40 KWYL “Wild 93.7” 7-2001

Current Format: dance top 40 “Wild 93.7”

Local Live 6am - 9am M-F

Satellite broadcast remaining hours weekdays / weekends

KHXR 94.5

ID: Sun Valley / Reno, NV

Power: 12 kw

Owner: Lotus Communications

Co-owned: KPTT, KHIT, KDOT, KOZZ

History: Same format since powered up in late 1999

Format: country “94.5 the Mountain”

Local Live 5am - 10am M-F
Satellite broadcast remaining hours weekdays / weekends

To whom it may concern:

I recently received a copy of MM Docket No. 01-317, concerning "Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets", from Mr. Harry C. Martin, a regular contributor to the magazine "BE RADIO", an attorney with the firm "Fletcher, Heald and Hildreth, PLC., Arlington, VA.

Mr. Martin mentioned that the Federal Communications Commission not only is looking for comments to this docket from radio station owners, managers, employees, contractors and the general public as well.

That I have only had ten days to review the documents and reply, much of the information I have will be abbreviated, if not answered at all, from the pages of the document, depending on my knowledge of the information requested. These comments are being written in response to the docket.

First, I would like to introduce myself, including a short background:

My name is Gregg E. Zuelke. I am 43 years old.

I picked up my 3rd Class RT w/b'cast FCC license in 1974.
I picked up my 1st Class RT (keeping my b'cast) in 1978. (Currently PG-GB-03757)
I also hold an AR license (technician / no code) KC7NXL, current.
I joined the navy in October 1977, studying and working electronics until 1992, when I was discharged for medical reasons.

My background experience in radio/television includes:

Mar 1974 - Oct 1977 ... KNIS 91.3 Carson City, NV (board)
Mar 1974 - Oct 1977 ... KPTL 1300 / KKBC 97.3 Carson City, NV (board)
Jan 1978 - Dec 1978 ... WFYR 103.7 Chicago, IL (while at Great Lakes, IL for electronics training) (board)
Jan 1979 - Dec 1979 ... KFRN 1280 Long Beach, CA (while at Long Beach NSY shipyard overhaul) (board / eng)
Jan 1979 - Dec 1979 ... KNX 1070 Los Angeles, CA (while at LBNSY shipyard overhaul) (board / eng)
Jan 1980 - Oct 1986 ... XETRA 690 Tijuana, BC (San Diego, CA studio) (NavSta San Diego, CA) (board / eng)
Mar 1994 - Oct 1994 ... KRNK-4 Reno, NV (master control)
Oct 1994 - Nov 1996 ... KBCH 107.7, South Lake Tahoe, CA (board / last 3 months chief eng / station sold 1996)

My background in electronics via the navy includes:

Transmitters from 5 watts to 20,000 watts, AM/FM/PM/CW, both analog and digital services, receivers, satellite services
antenna systems, radar systems, telephony services within the ship;
Certified calibration technician though NBS/NIST, to Naval lab class 2 repair and maintenance;
Certified on several cryptographic electronic equipments for repair and maintenance;
Certified quality control inspector on major ship equipment electronics installations;
Electronics training officer (NCO) on third and fourth ships;
13.2kV electric service, both 60Hz and 400Hz;
Other items as required.

In writing this article, I will include comments and notes from various [other] articles I have gleaned in the last months, which I will use to strengthen my opinion toward the document request for information.

This first comment, though it does not participate in the "Local Radio" topic, partially explains why I do not feel that such a large ownership of radio stations - in general - is in the best interest of the public, including when it comes to technology development. It is noted that many stations that were listed on the "AMSTEREORADIO.COM" web-site, as well as other web-sites that listed information about AM STEREO, noted that due to the time the FCC took to chose one standard for AM STEREO broadcasts, many stations decided to shut down their AM STEREO broadcasts since they were using other types of equipment and did not want to or could not afford to purchase new equipment to meet the new standard. However, large conglomerates may also guide the development - or demise - of a technology. Below are just a few comments stating that conglomerates such as Jacor/Clear Channel, ABC/Disney, AMFM Inc., etc., by their 'policy', turned off AM STEREO in all stations that they purchased. In my opinion, if such conglomerates decide that they do not like the technology, that manufacturers - over any complaint of smaller stations, will stop development of the technology. As well, with new IBOC technology, smaller stations who have already purchased equipment such as AM STEREO units, will have to dump that technology and be forced to purchase even more equipment. This may cause the demise of many smaller stations as well due to

their overburdened budgets.

From the web-site "AMSTEREORADIO.COM"

According to the web-site, the last "update" to the page, was on April 30, 2001.

(NOTE: *Jacor* and *Clear Channel* are interchangeable since Jacor was bought out by Clear Channel. I have merged the two companies into this one group for simplicity.):

540 KWMT in Fort Dodge, Iowa - Here's a country station which was broadcasting in AM STEREO until November of 1999. Unfortunately, they reverted to mono as a result of being acquired from J.P. and John Jenkins of Bloomington, Illinois, by *Clear Channel* in August of that year. So once again, we have another victim of Clear Channel's pathetic anti-AM STEREO policy.

550 KFYZ in Bismark, North Dakota - Currently running an AC / Talk format with Oldies on the weekends, KFYZ originally broadcasting in AM STEREO with the Harris system back in the mid-80's. A switch to the Motorola C-QUAM system took place and KFYZ continued to broadcast in full blown stereo up until *Clear Channel* (aka *The Evil Empire*) got a hold of them. To illustrate this, let's play compare and contrast with their logos for a moment: (logo's on AMSTEREORADIO.COM), The former logo of KFYZ (on the left) clearly states the word "STEREO"; however, this word interestingly disappears in their new logo (on the right) which now states "550 AM RADIO". It's a pretty safe bet that this was no accident and we have the gang at Clear Channel with their anti-AM STEREO policy to thank for the loss of another opportunity to hear music in stereo on the AM band.

570 KLAC in Los Angeles, California - As of October 2000, and thanks to the brilliant thinking of anti-AM STEREO corporate broadcaster *Clear Channel*, the last MOR formatted station in Los Angeles plans to switch formats to that of All Talk. However, the real disappointment began back in December 1998. Since that time, there has been no stereo broadcasting to be heard or even a pilot tone from the former *Adult Standards 570 KLAC*. The exact moment came on December 19, at about 12:15am, when they were playing Christmas Adult Standards and a slight "pop" was heard during the Carpenter's "Have Yourself A Merry Little Christmas." After this, all programming went to mono permanently.

570 WSYR in Syracuse, New York - The News & Weather Station, Newsradio 570 WSYR (which is really more of a Talk station), was a mix of news and talk when they first went stereo using the Kahn/Hazeltine system. However, they were still stereo when they went Talk on a full-time basis. There's no need to guess why they are in mono though, as they are now owned by *Clear Channel*.

600 KOGO in San Diego, California - Formerly known as KLZZ with a Top 40 format in AM STEREO. (Originally with the Kahn/Hazeltine system and then a switch to Motorola C-QUAM.) Since being acquired by Jacor, however, a switch in calls to KOGO occurred as well as a format switch to that of *Hot Talk*. Needless to say, bye-bye to stereo broadcasting as a result of *Jacor's* anti-AM STEREO policy.

600 WMT in Cedar Rapids, Iowa - 600 WMT was one of the first stations in Cedar Rapids to begin broadcasting in AM STEREO with the Motorola C-QUAM system back in the mid-80's. Naturally though, since *Jacor* got a hold of them, the days of AM STEREO are a thing of the past.

620 KEWS in Portland, Oregon - Another station acquired by *Jacor*. Of course, this means so long to AM STEREO broadcasting as well.

630 KHOW in Denver, Colorado - The old *63 KHOW* originally began broadcasting in AM STEREO using the Harris system back in the mid-80's. However, since being acquired by *Jacor/Clear Channel*, the days of playing music and broadcasting in stereo are a thing of the past. (Gee, what a surprise.) Naturally, the music format was ditched for that of Talk and the stereo exciter was put out of commission. With the new monikers *The Talk Station* and *Real Talk K-HOW*, this yet another **real waste** of present bandwidth for a once great AM STEREO music station if you ask me. What a shame.

690 XETRA in Tijuana, Mexico - Located near San Diego, California, this 77,500 watt flamethrower (once known as Mighty 690), was a Top 40 powerhouse in the early 80's. Actually, XETRA was the prototype Kahn station going back to the late 60's. Known then as Beautiful X-tra Music, they tested the latest version of the Kahn/Hazeltine exciters and also used the Kahn PowerSIDE system for a time. Thanks to *Jacor*, even the use of the Kahn PowerSIDE has ceased to operate.

700 KWLW in North Salt Lake City, Utah - Formerly a Beautiful Music station, KWLW decided to simulcast Oldies 94 KODJ-FM for a period, but unfortunately in mono. It was thought that their next plan of attack was to become yet another yakety-yak station, but instead became *Classic Country AM 700*. Actually, the truth be told, when *Jacor* bought the station and killed the Beautiful Music format, they intentionally killed their stereo too after ordering the engineer to remove the stereo generator from service. Unfortunately, this is all part and parcel of the stuffed shirts' anti-AM STEREO attitude at Jacor.

700 WLW in Cincinnati, Ohio - Simply put, WLW killed their stereo for "coverage reasons". Specifically, WLW is owned by *Jacor*, and Jacor doesn't believe in AM STEREO. They own 21 AM stations in the United States, and the last one that had been broadcasting in AM STEREO - 980 WONE in Dayton, Ohio - shut it off around the beginning of 1999.

790 WTAR in Norfolk, Virginia - This is an interesting and bizarre story, so please bear with me. Back in the mid-80's, AM 790 WTAR went stereo, with the Motorola C-QUAM system and their Oldies format, only to have the station sold years later and the Oldies format scrapped completely in favor of Talk. Although WTAR did transmit the 25hz pilot with no stereo programming, the station was once again sold, this time to *Clear Channel Communications*; subsequently, the pilot was turned off for good and the oldest station in Virginia at AM 790 (WTAR) was given a new spot on the dial. (More to the story but only on how WNIS 850 and WTAR changed formats between them and a fiasco that came up with that and AM 850 50KW upgrade fiasco.)

840 WHAS in Louisville, Kentucky - Known these days as *Newsradio 84 WHAS* with the moniker *Depend On It*, WHAS sadly dropped their AM STEREO when they had some problems with their C-QUAM exciter back in 1995. At that time, management decided to revert to mono due to the Talk programming which was taking over the station. (It doesn't help one bit that anti-AM STEREO broadcaster *Clear Channel* owns them now.)

930 WNZS in Jacksonville, Florida - WNZS is running an All Sports format these days, but back in the early 90's as WRXJ, they had an Oldies format in full blown AM STEREO. (Their calls were WJAX before this, but the WJAX calls now reside at 1220 AM.) Word has it that WNZS sounded great, but once *Clear Channel* got a hold of them and switched the calls and format, they wasted no time in shutting off the C-QUAM exciter for good.

980 WONE in Dayton, Ohio - Currently running and Adult Standards format and simulcasting on 1340 WIZE in Springfield, OH, WONE has recently decided to stop broadcasting in AM STEREO. When they were still running a Country format, they were a true AM STEREO operation. However, in 1993, they switched to a Talk format and switched off their stereo. Then, in late 1994, they switched to their current format. For awhile, their slogan was, *The Superstars of Music in Stereo*, but unfortunately, they were only sending the pilot tone out. Now they're just straight mono. It is unclear exactly why this happened, but I'd bet that the reason *Jacor* owns them has *everything* to do with this decision. Sadly, WONE was the last *Jacor*-owned station that was still broadcasting in stereo. This brings the grand total of AM STEREO killings to 21 out of 21 for *Jacor*'s AM stations.

1150 KXTA in Los Angeles, California - In their Top 40 days as *Hot Hits KIIS AM* (and before that as KPRZ), these guys started to broadcast in Motorola C-QUAM AM STEREO back in 1984. However, since being acquired by *Jacor*, they switched their calls and format to that of XTRA Sports and have made AM STEREO a thing of the past.

1170 KCBQ in San Diego, California - A former Top 40 and then Oldies station with a lovely Motorola C-QUAM AM STEREO signal. *Jacor* moves in, AM STEREO moves out. Need I say more?

1180 WHAM in Rochester, New York - Once this 50,000 flamethrower was acquired by *Jacor* and switched to their present day Talk format, they also switched off their Motorola C-QUAM exciter for good too. It's no secret that we have the stuffed shirts and other assorted suits at *Jacor* to thank for this wise move.

1190 KEX in Portland, Oregon - This 50,000 watt Full Service operation was a great sounding station, prior to their decision to revert to monophonic broadcasting that is. It is likely that it will remain this way as per the "sore loser" behavior of the gang at *Jacor*.

1220 KIIS in Canyon Country, California - Until recently, these guys were known as KBET and were running the XTRA Sports format. Like so many others before them, they were broadcasting in AM STEREO when they were a music station running an Adult Contemporary format. Sadly, those days are over, as the stereo pilot light has since been turned off. Word has it, "the station would not go stereo again because of the corporate policy prohibiting AM STEREO broadcasting for any *Clear Channel Communications, Inc.* stations."

1280 KIT in Yakima, Washington - These days KIT is running a Talk format and has unfortunately been "possessed" by The Evil Empire (i.e. *Clear Channel*). KIT originally began broadcasting in AM STEREO back in the mid-80's with the Harris system when they were running they described as an "old line" MOR station. Since being acquired by *Clear Channel*, one can assume that any stereo capability they might have had has been demonized and doomed to death.

1320 WJGR in Jacksonville, Florida - Currently running a Talk format with the moniker The Source, the days of broadcasting in stereo are a thing of the past at WJGR. Back when they had the calls WQIK they were indeed a full fledged AM STEREO operation, but they have since reverted to glorious mono. No further details are available, but it is known that from about 1984 to 1999 they were owned by *Jacor/Clear Channel* and the AM STEREO audio processing equipment from CRO is still in use today, just set to mono.

1360 WCKY in Cincinnati, Ohio - WCKY used to broadcast in AM STEREO in the mid-80's when they were known as WWNK AM 1360. At this time, they were simulcasting an AC format with 94.1 FM. I'm told the difference between the two was night and day and with the wideband engaged on the Sony SRF-A100 they were AWESOME! The AM side had much more warmth and presence. Later on, it was discovered that the AM STEREO exciter had problems and they honestly tried to fix it, but Harris was very frustrating to them and they finally killed it in frustration. Unfortunately, there is no hope for this station as it's owned by *Clear Channel (formerly Jacor)* and the equipment remains in the rack to collect dust.

1370 WSPD in Toledo, Ohio - WSPD originally started broadcasting in Stereo using the KAHN/Hazeltine system back on Tuesday, December 28, 1982, but eventually went on to switch to the Motorola C-QUAM system. On Wednesday, January 19, 1983, their stereo status was officially announced on the air with the proclamation that WSPD had become "The first station in northwestern Ohio to broadcast in AM STEREO." Today, however, they are yet another example of an AM station who has gone on to not only switch to a News/Talk format, but to also kill their stereo for "coverage reasons." Yeah, right. The fact of the matter is that it's the geniuses at *Jacor* who made this decision to revert to mono. Do these guys really believe that mono is superior to stereo?

590 WDWD in Marietta, Georgia - Formerly WKHX, these guys used to broadcast in Khan/Hazeltine AM STEREO with a *Real Country* format. Since being acquired by *Disney*, however, a switch in calls has ensued and has the blowing out of the pilot light. Is anyone surprised?

630 WMAL in Washington, District of Columbia - Actually located in Bethesda, Maryland, WMAL started broadcasting in AM STEREO using the Khan/Hazeltine system back in the early 80's. With this in mind, WMAL can truly be considered one of the pioneers in the history of AM STEREO broadcasting, and were considered by their faithful listeners to be, "the best sounding AM STEREO station (or just plain AM if that's all you had.)" However, time passed, management/format/ownership changes occurred, and around 1988 yet another brilliant consultant convinced management that AM STEREO was not in their best interests in regards to their coverage area. These days, WMAL is *ABC/Disney* owned and is yet another News/Talk station still without AM STEREO anywhere to be found.

1300 WTAQ in Grange, Illinois - This former Spanish format stopped broadcasting in AM STEREO when *Disney* took them over on July 16, 2001.

1310 KMKY in Oakland, California - Currently running the Radio Disney format for children, the C-QUAM exciter was taken out on December 15, 1997 at the order of the new owners *ABC/Disney*. ABC has a ridiculous "corporate policy" of no C-QUAM in their AM stations, so we can all assume what the bean counters and stuffed shirts will systematically set out to do with their other stations.

1560 WQEW in New York, New York - Formerly a Classical station, then a switch to a successful American Popular Standards format (with one of the best sounding AM STEREO signals anywhere, I might add), *ABC/Radio Disney* came in on December 28, 1998, switched the format and wasted no time in pulling the plug on AM STEREO. It wasn't broke, boys, so why did you have to "fix it" so that your new listeners can't receive you in AM STEREO anymore?

1580 KCWW in Tempe, Arizona - Yet another *Radio Disney* station that was formerly broadcasting in AM STEREO but is now mono. Specifically, the pilot tone is gone now and the stereo is too. Interestingly, this is one of the few Radio Disney stations that actually carried the format in true AM STEREO. As well, KCWW was at one time the site that Motorola used to show possible purchasers what AM STEREO can do for their station.

(mixed owners)

590 KOMJ in Omaha, Nebraska - Now known to listeners as *Magic 590 KOMJ* with an Adult Standards format, for years they went by the classic three letter calls WOW and were a once great Country station using the Kahn/Hazeltine system. They did make the switch to C-QUAM but, sadly, fell victim to the “loss of coverage” fallacy mindset of owners **Journal Broadcasting** in September 1999.

640 KFI in Los Angeles, California - LA’s *More Stimulating Talk Radio 640 KFI*, on the orders of **AMFM Inc.** and their anti-AM STEREO policy, reverted to broadcasting in craptacular mono as of the middle of January 2000 after over 15 years of broadcasting in AM STEREO. According to Marvin Collins, CE at KFI, “It is an AMFM Inc. decision, not mine, and looks to be permanent.

670 KBOI in Boise, Idaho - Currently known as *The Station to Depend On, News/Talk 670 KBOI* these guys also carry The Midnight Cowboy overnight feed with Bill Mack. Unfortunately, KBOI is no longer broadcasting in AM STEREO. Why? Well, KBOI killed their AM STEREO when the processing at the station was changed from the CRL to an Optimod 9200. Add to this, the fact that the present owners, **Citadel Communications Corporation**, doesn’t want AM STEREO in their Stations. As a result, the AM STEREO generator(s) that were once a big part of KBOI are gone forever.

1010 WINS in New York, New York - A powerhouse station to say the least, it seems as though when **Westinghouse** took them over, they also decided to shut the stereo off too. I used to love hearing their “*All News, All The Time. This is 1010 WINS. You Give Us 22 Minutes and We’ll Give You The World*” liner in stereo.

1110 KFAB in Omaha, Nebraska - Currently running a News/Talk format with the moniker SuperStation 1110, the pilot light was on, but there had been nobody home for quite some time. Apparently, not a lick of separation had been heard from KFAB since they abandoned their music format and switched to News/Talk back in 1990. As of late January 2001, the pilot light was blown out altogether. These days, KFAB’s programming choices are poor, and it’s truly amazing that anti-AM STEREO broadcaster **AMFM Inc.** hadn’t shut off the C-QUAM exciter for good a long time ago.

1390 WGCI in Chicago, Illinois - Currently running an All Gospel format (and before that know as *Dusties 1390*), WGCI had been broadcasting in stereo using the Motorola C-QUAM since the mid-80s. Until recently that is. This is quite surprising for such a station that has always been a supporter of AM STEREO. Presently, there is neither any separation in their signal, nor is a pilot tone being sent out. The reason why? Well, WGCI was owned by Gannett for all of those years when they were broadcasting in stereo. however, they sold WGCI to Chancellor, which latter became **AMFM Inc.**, and we all know what the next move was: bye, bye AM STEREO.

(NOTE: At the time of the web-page update, no station owned by Clear Channel or Jacor is listed in the Extended AM Band.)

DISCUSSION & COMMENTS:

Numerical limits are definitive. We seek comment on the reasonableness of this interpretation:

(A) 45+ stations = no more than 8 total stations, no more than 5 in the same service

Gives less than 20% of a market to one corporation.

(B) 30-44 stations = no more than 7 total stations, no more than 4 in the same service

Gives a corporation nearly 25% control in a market depending on amount of stations total

(C) 15-29 stations = no more than 6 total stations, no more than 4 in the same service

Gives a corporation over 35% control of a market depending on the amount of total stations

(D) 14 or fewer = no more than 5 total stations, no more than 3 in the same service

Gives a corporation anywhere between 35% to 100% market ownership. (Noting that as small of a number that may be in the market, 100% ownership would be hard to discriminate against. Example ... Fallon, NV for many years only had two stations, one AM and one FM, both owned by the same family.)

To me, “B”, especially “C”, with careful consideration to “D” depending on the market, are weighted toward large corporations and conglomerations. “C” could give the market to only three owners, “D” could give to one owner. “A” gives the biggest diversity, while “B” keeps a slight advantage of diversity since a minimum of five stations ownerships would have to be in the market area.

(Reno, Nevada’s market currently meets “B”, 30-44 stations, though several of the stations are licensed in California.)

Numerical limits address diversity only:

Numerical limits presumptively consistant with public interest:

Here is an interesting discussion to the above section.

If reading the list of radio stations, you may notice that all stations belonging to “Americom” and “NextMedia”, had moved into new studios early 2000.

May 2001, I walked into the building, 300 E. 2nd Street, and went up to the 14th floor. Upon exiting the elevator, I went to the suite told to me by Steve Weber, engineer on site. Entering the suite, I saw one large desk in the lobby, and two signs: One stated “Americom” (listing all six stations owned by them), the other stated “NextMedia” (with the three stations [currently in the building] owned by them. (KSRN-FM was still located at a separate

studio, 805 S. Virginia, but the STL equipment was housed in the E. 2nd Center Street building. (As noted before, it is NOW also in the same building.)

As listed in the "current format" lines of each station [above], six of the studios - at 1:30pm, were empty. Only three studios had a live broadcast running at this time. The rest were either on voice-track or satellite/network broadcast.

The main equipment rooms for the two corporation's studios were down separate halls, as were the studios. The 'network' equipment rooms were also separate, but the main equipments were linked, so audio/programming/commercials, could be passed from one side to the other without having to carry a portable tape, DAT, CD, etc., from one hall to the other.

Steve Weber is only a contractor, but he contracts to both conglomerates.

"Reno Radio Representatives" are also in the same suite. The group contracts to both stations as the sales force for them. (I once called for a price quote from them, and nine station listings were sent by fax to the number provided. KSRN - at that time - still had its own sales force and sold their own time.) Should you call the primary numbers listed for any of the radio stations in the main building, the secretary/receptionist will answer "Reno Radio Representatives." (In all of the phone books that float around the 100 mile radius of Reno, NV, there is no listing for either "Americom" or "NextMedia".)

The receptionist also handles all information sent to Americom, NextMedia and Reno Radio Representatives.

Also review the "history" and "current format" listings of the radio stations; there have been many changes soon after Americom and NextMedia purchased the smaller stations, and more once the two moved into the same floor of 300 E. 2nd Street.

Currently, the stations owned by Americom and NextMedia are registered in various towns/cities such as: King's Beach, CA. South Lake Tahoe, CA. Dayton, NV. Reno, NV. Tahoe City, CA. Incline Village, NV. Carson City, NV., with transmitters on Slide Mountain, Peavine, Red Peak, McLellan, Truckee Meadows [valley] (... mainly the AM stations).

Listening to material other than the main programming, it is noted that the person who does the weather, road conditions and - being the Reno, NV area is in the Sierra Nevada - items like the ski reports, is the same for all stations, only the station ID is changed normally.

Commercials played on one station are pretty much the same for all of the stations when played on those that do not command quite as high of rates due to their Arbitron ratings. Commercials on the higher rated stations are less local anymore, relying more on national companies, due to the higher rates charged. (My mom's business decided not to advertise on Americom or NextMedia's higher charging stations due to the costs of doing so.)

(INTERESTING NOTE:

A reduction in places where rent is due since 10 stations now occupy only one building floor;

A reduction in radio 'talent' since many broadcasts are voice-track or network after the morning commute, saving a LOT of finances from taxes, social security, insurances, etc., (network costs are quite a bit less overall);

A reduction in office staff, program managers, sales staff, etc., since a few now work for many more;

Yet, rates are quite a bit higher for these stations now than they were only 5 - 6 years ago. (Sub-note that I did work for a radio station and knew other stations in the process so I knew the going rates back then.) I [personally] would think that with such a reduction of financial burdens, rates would stay somewhat in pace with inflation only, and actually be lower overall due to the low overhead.

Public service/community service' messages are also fewer, and what does air is often the same on all stations since all stations share the same network service, often to do with the policies of large[r] corporations/conglomerations. (If you do not have the people to go out to find public services either, nor the variety of owners to pick what they want, public service drops dramatically.)

To the average general visitor - only because of the names on the signs and the "legal ID's" otherwise - would you not even realize there were two separate entities in the building if you took a tour.

Other than the duo-corporation location of Americom/NextMedia, the same goes with Citadel and Lotus Broadcasting in Reno, NV., however, Lotus is independent so it has more flexibility to do what it wants to do, as cited in the "Notes" sections of the radio listings.

In Reno, 13 major stations - in 1994 - used to be scattered at eight separate places such as: South Kitzske, West Moana, East Moana, Wronde Ave, Timber Way, South Virginia, North Virginia and Greenbree; each location was owned by a separate company as well. (Lotus has been on Sutro Way for 25 years with four stations, the fifth added about 2 years ago; KWYL and KNHK were started after Citadel moved to Plumb Lane.) Commercials used to be energetic and imaginative and from a variety of advertisers; public announcements were a daily; prices were reasonably competitive; music was varied and had a nice variety as well; more news; commentaries were more daring; local interaction was well noted.

No more, mostly because of consolidation - 20 stations, 4 owners, 3 buildings, added with automation and reduction in staffing.

My thoughts on the ownership laws, just on this alone, is that not only should be the quantity of stations per owner be reduced - as stations are sold since the current situation was caused by the law - unless the company is found to be breaking the law, but as well more care should be taken to watch what areas corporations also buy in to, since a 100 kw station 80 miles away can easily walk into the local area but still be [legally] outside the jurisdiction. This can also take away from [small] local stations since [outside] stations can bombard the market just as easily as being IN the market area. (The law of supply and demand is understood that if you produce a better product you will usually win since your product will be demanded more often. But if there is a glut of a product to where prices are lower since you can sell cheaper, even if the product is defective people will buy first since that product is easier to get as well, putting smaller people out of business even if they do provide a good product.)

(Walmart over a local clothing store; Home Depot over a local hardware store; Office Depot over a local office supply store; I have trouble finding 'unique' things anymore since the small stores are out of business ... the major stores only buy in bulk and often will not research or 'special order'; it has to be in their book or not at all.)

Reno is already concerned about consolidation and competition, publishing two separate articles about such in just about four months:

<article>

Consolidation trend creates concerns about radio diversity

**By Frank X. Mullen, Jr.
Reno Gazette-Journal
Sunday, November 18, 2001**

Spurred by deregulation of the radio industry, nearly half of Reno-Sparks' 36 radio stations are now owned by three big players, reflecting a national trend towards ownership consolidation.

In addition, automated systems have allowed some stations to go on the air without live DJs, while syndicated and copycat shows offer virtually the same programming in Reno as they would in Miami or Seattle.

It's all part of the radically changing landscape of the radio airwaves that some say has eliminated local ownership, flavor and diversity. Others say the trends strengthen radio and draws more diversity to airwaves.

"The consolidation of radio stations in Reno and across the country is too bad," said Brian Bahouth, general manager of KUNR (88.7) the public broadcasting station at the University of Nevada, Reno. "I think it allows for fewer choices."

But others said the concentration of a lot of stations under one corporate roof doesn't hurt the listening public.

"We've got the whole spectrum here," said Bruce Van Dyke, morning disk jockey on KTHX 100.1 FM. "Some people moan about the loss of the quaint image of 1962, but here, we see national trends and some purely local stations.

"We've got a lot of national ideas, but that's not bad. That's the marketplace in action," Van Dyke said. "There are still spurts of individualism. There are a lot of stations and shows that are very Reno and wouldn't work elsewhere."

The Reno market is ranked as the 127th largest in the nation, according to Arbitron, the radio ratings service. Reno has as many stations as markets twice its size.

"That's a lot of stations, maybe too many than there ought to be," said Dan Mason, Reno program director for Citadel Communications, which owns KKOH-AM, and FM stations KBUL, KNHK, KWYL and KNEV.

The big players came into Reno and other markets. Citadel, for example, owns 205 stations --- 140 FM and 65 AM --- in 42 markets, with clusters of four or more stations in 31 markets. according to the corporation's Web site. Americom Broadcasting owns five Reno stations and Lotus owns four. ***(PERSONAL NOTE: NextMedia is in the Reno, NV market and owns several stations as well which was missed in this article; the actual ownership count per corporation and true amount of radio stations as listed in the article is also incorrect. True count noted in the station list above; many 'distant' stations are only because of registration but still owned by just a few major players locally.)***

Those three big players, who own 14 of 36 Reno-based stations. Truckee Meadows listeners can also tune into six more distant stations, with 13 more distant stations available in various parts of the metro area.

Mason said the Federal Communications Commission formerly required stations to be located in the city where they were licensed to serve. But that rule changed and stations may now be located outside city limits but broadcast into the market.

"I guess the FCC meant to create more diversity in programming, more choices for people," Mason said. "But stations lost money and a lot of stations consolidated."

Mason said the consolidation has homogenized radio to some extent.

"Musical tastes differ from area to area," he said. "Some formats travel well and other's don't. That's the trick in radio, you learn those difference and plan accordingly."

The ALICE format, for example, which features new music and hits from the 80s and 90s, can be heard in Reno, Sacramento and Denver. The Howard Stern program sells in New York, Reno and many other markets around the country as does conservative talker Rush Limbaugh.

But Van Dyke disagreed that Reno radio has lost its identity on the dial.

"When something hits big in one market, it could pop up nationally, just like things in every section of the economy," he said. "Certain things do work nationally, but not everything."

Mason said travelers can easily hear the differences in market tastes when they go to large urban areas and the dials are filled with hip-hop or when they travel to southern cities and hear a different sort of country music than can be heard in Reno.

Van Dyke said automation isn't necessarily a bad thing either. He said that it helped cut the fat out of the local airwaves.

More changes are on the way. Many stations are already streaming their broadcasts on the Internet and satellite radio, already in other markets, will soon hit Reno. Satellite broadcast programs to dishes on listener's cars.

"That's the next big thing," Van Dyke said. "You get 100 channels or so for like \$10 per month."

But industry watchers said local radio, which withstood the challenges of television, digital technology and corporate greed in the last 15 years, won't be toppled by satellite broadcasts.

"It will affect us, but it won't kill us," Van Dyke said. "There's things that national radio can't do, such as local weather and remotes, that national radio can't do."

In the meantime, he said, the Reno radio market remains vital and diverse.

(Please note again the items from AMSTEREO.COM, when reading this, as this also talks about stifling of technology when large companies are born, knocking out smaller businesses):

<article>

**Reno Gazette Journal
Sunday, March 17, 2002
Business - Section "E" (front page)**

Big Business

Why the sudden rise in the urge to merge and form oligopolies?

By Yochi J. Dreazen, Greg Ip and Nicholas Kulish
THE WALL STREET JOURNAL

Everywhere you look, powerful forces are driving American industries to consolidate into oligopolies --- and the obstacles are getting less formidable.

The rewards for getting bigger are growing, particularly in the world of technology, media and telecommunications, where fixed costs are especially large and the cost of serving each additional customer is small. Some snapshots:

- Twenty years ago, cable television was dominated by a patchwork of thousands of tiny, family-operated companies. Today, a pending deal would leave three companies in control of nearly two-thirds of the market.

- In 1990, three big publishers of college textbooks accounted for 35 percent of industry sales. Today they have 62 percent.

- In 1993, then-Defense Secretary William Perry told executives of more than a dozen big defense contractors that half their companies wouldn't exist in five years. He was right. Today, five titans dominate the industry, and one of them, Northrop Grumman Corp., Friday made a surprise \$5.9 billion bid for TRW Inc., a maker of auto parts, defense and aerospace equipment. The offer includes \$5.5 billion in assumed debt.

- In 1999, more than 10 significant firms offered help-wanted Web sites. Today, three firms dominate.

Even as economic forces push these industries toward oligopoly, some of the forces that checked this trend in the 1990s are weakening. United States antitrust cops, regulators and judges seem less antagonistic toward business. Just last week, a federal appeals court opened the door to another round of media mergers by striking down rules that in effect barred cable companies from buying broadcast networks.

And investors are less eager to finance upstarts who challenge giants. In all, about \$73 billion was raised for enterprises of all sorts through venture-capital financing and initial public offerings last year. That was robust by long-term historical standards, but it was less than half the \$164 billion raised in the peak year of 2000.

The appetite for mergers is restrained by a sagging stock market and recession, but it probably will revive as the economy rebounds. "Even with the economic slowdown," President Bush's Council of Economic Advisers noted recently, "merger activity in 2001 was well above average levels during the past three decades."

An oligopoly, a market in which a few sellers offer similar products, isn't always avoidable or undesirable. It can produce efficiencies that allow firms to offer consumers better products at lower prices and lead to industry-wide standards that make life smoother for consumers.

But an oligopoly can allow big businesses to make big profits at the expenses of consumers and economic progress. It can destroy the competition that is vital to preventing firms from pushing prices well above costs and to force companies to change or die.

Rates for cable TV soared 36 percent, almost triple the amount of overall inflation, since the industry was deregulated in 1996 and consolidated in a few big firms.

(Several paragraphs on:

OPEC's oligopoly members being able to manipulate the control over oil supply and prices;

Micro Technology wanting to purchase South Korea's Hynix Semiconductor, giving 4 firms 83 percent control of all chips on the market, up from 46 percent in 1995;

Thomson Co., No. 2 in the \$3.2 billion-a-year college text-business, bidding on Harcourt General Inc., No. 4. Currently, Britain's Pearson PLC, Canada's Thomson and New York-based McGraw-Hill, dominate the U.S. college text-book business

)

But the industry also shows two big economic risks that consolidation poses for consumers.

The first is rising prices. The best-selling introductory economic textbooks go for more than \$100. The Labor Department's measure of textbook prices that publishers charge bookstores and distributors has climbed 65 percent over the past 10 years while overall producer prices rose just 11.2 percent.

The other risk is that the textbook oligopoly, with its profits depending on hard-backed textbooks and its Web sites primarily intended to help sell books rather than replace them, will stifle innovation.

DSL, the high-speed Internet pathway that relies on normal telephone lines, was developed by a Bell engineer in 1989. It languished for almost a decade because the Bells didn't want to cannibalize another, more lucrative high-speed Internet service for businesses. The Bells began deploying DSL broadly only after upstarts like Covad Communication Co., a Bell rival founded in 1996, quickly proved the consumer market for it.

With money flowing in from eager investors, upstarts rolled out new technologies and business models the Bells were unwilling or unable to devise. Newcomers used high-capacity fiber-optic cables instead of old copper phone lines. Others allowed Internet service providers to install equipment at telephone switching centers. But when the capital markets all but stopped funding the Bell rivals two years ago, many innovators disappeared.

The pressure to consolidate is evident in the young online recruitment industry. For a while, it looked as if Head Hunter.Net Inc., would be a rare dot-com startup: profitable and independent. Last summer, it showed its first quarter of positive cash flow. A month later, it agreed to be bought by CareerBuilder Inc., itself the product of a merger.

The Web sites face huge marketing costs to attract a critical mass of job seekers and employers, said Craig Stamm, who was chief financial officer of HeadHunter.Net and now has the same post with the merged firm. With enough customers, the added cost of a new one is nearly nil. With too few, he said, "You slow down sales and marketing. Customers go away. There's even less revenue to invest. It's a downward spiral."

In online recruitment, market leader Monster.com was spending heavily on marketing, backed by its deep-pocketed parent, TMP Worldwide Inc. Worried about keeping up, HeadHunter.Net decided to merge with CareerBuilder, which is backed by two newspaper chains. The Federal Trade Commission scrutinized the deal and approved it without comment last November. TMP Worldwide's agreement to buy another competitor, HotJobs Inc., was scuttled, in part because of repeated requests for information from the FTC. In the end, Yahoo Inc. bought HotJobs.

All this transformed a market that at the height of the Internet bubble had more than 10 competitors, most routinely offering 50 percent discounts to lure job postings. Today the market is dominated by three firms, which are more committed to holding the line on prices.

In other industries the growing strength and size of customers is prompting suppliers to get bigger, too. In eastern Massachusetts, three big organizations came to control 75 percent of the insurance market, which gave them substantial bargaining power with local hospitals. If a hospital wouldn't offer the one health maintenance organization deep discounts, the HMO could divert patients to others that would.

Then the hospitals started to join forces through mergers. The most significant was the December 1993 merger of two of the most prestigious, Massachusetts General Hospital and Brigham & Women's --- a combo that created Partners HealthCare System Inc.

“The bargaining power in the system has, in fact, shifted back to the providers, indisputably,” said John E. McDonough, a health-policy professor at Brandeis University and a former Democratic state legislator.

TCI cable used to be a community oriented system. All local TV stations were onboard in 1994. Soon after TCI was bought out by AT&T, many remote cable rebroadcast systems were dropped due to financial considerations. As well, they increased local television fees for services by more than 400%.

One small TV-LP station, KDP-55 @ 1 kw power, was dropped as it was unable to pay the increase. (This station was extremely independent, often playing a full movie w/o commercials, concerts, cartoons [dropped from primary networks as the early 90s versions for the ‘new’ generation of kids were brought on-line during the media mergers and buy-outs], and many oddball shows that major networks just would not pick up.)

When the station lost cable status, the local TV guide dropped them from the pages in general.

Being the local TV guide dropped them, “TV GUIDE” suddenly dropped them as well.

Since they lost the viewing audience and basic advertising in various guides, they lost revenue since advertisers thought that they no longer had a way to get their ads out, being less and less people [moving in] even knew that they [KDP-55] existed.

They finally folded in early 2000, as Citadel, Americom and NextMedia (after the major consolidations) also would not exchange advertising time (which is pretty common otherwise between radio and TV stations in Reno). (Citadel partnered with KOLO-TV 8 (ABC); NextMedia partnered with KRNVT-TV 4 (NBC); and Americom partnered with KTVN-TV 2 (CBS)). Since they partnered with other TV stations, they were told not to advertise other local/independent stations or lose the partnership. (Lotus for some reason with everything that they DO for the community, doesn’t trade or sell to other stations in general. Go figure.)

The next three articles magnify both the power of conglomerates in general and the ‘greed’ over ‘content’ mentality that has come of the consolidations (loss of independent stations):

<article>

KSRN changes format Monday; no more big band music

Forrest Hartman
Reno Gazette-Journal
3/15/2002 05:07 pm

One of the only radio stations in Reno offering big-band music plans to change formats Monday evening, and the phone calls are already pouring in.

Thursday, radio station personalities Bob Carroll, Jack Slothower and Lou Gutenberger began saying goodbye; and listeners immediately voiced their displeasure. April Clark, vice president and general manager of NextMedia Group, which owns KSRN along with KTHX, KRZQ and KJZS radio, said she received more complaints than expected. Still, the format will change Monday evening.

“It’s been a difficult decision,” Clark said. “We’ve owned this radio station for just about three years now and we’ve worked very hard at improving the format so we can create greater revenue, so we can market the station and do the things that we’ve really wanted to do.... There’s been no increase in listenership, no support from the audience or anything like that. That led us to believe that there just aren’t very many listeners out there.”

At about 6 p.m. Monday, KSRN will begin broadcasting an easy-listening format offered by ABC Radio Networks. Some of the music --- songs by Frank Sinatra, Elvis Presley and Neil Diamond, for example --- will be consistent with what KSRN is now playing.

“The biggest misunderstanding that I’m finding is that people think it is an absolute flip, completely 180-degree change, and it’s not,” Clark said. “We’re just enhancing the format to acquire a greater listening audience.”

There will, however, be a noticeable difference. The station now plays a great deal of music from the 1930s and ‘40s, and that will mostly disappear.

“We won’t be playing the ‘40s and not a ton of the 50’s music that we’re playing now,” Clark said. Instead, KSRN listeners will hear light tunes recorded between the 50’s and the 80’s. Sinatra will be joined by the likes of Barbara Streisand, Barry Manilow, Chicago, Anne Murray and Elton John. Clark hopes the change will attract younger listeners, which advertisers covet.

“We’re shooting for a 35-64 (age group) right now with the new format,” Clark said. “We weren’t getting anything less than 75. We rated really well 75-plus, so that was the hard part. You know, you’ll hear the cold-hearted comments of it was a business decision, but we worked very hard at keeping that station alive for as long as possible. It just wasn’t working ... The current listeners, we’re hoping, will continue to listen and then we’ll gain more on top of that.”

The format change means that Carroll, Slothower and Gutenberger, all veteran radio personalities, are losing their jobs.

“I have to say that pains me to do that because they’ve all gained tenure in the market and have wonderful reputations,” Clark said. “If there was a way I could keep them on, I would. But this format comes with air talent.”

Clark said the decision was financial, and she hopes to be able to rehire them in the future.

Along with the music change, the station is dropping a number of programs. Clark said KSRN will no longer air the old-time, radio-drama show “When Radio Was”, the Oakland A’s baseball games, Saturday’s “Radio JukeBox”, Charlie McCoy’s Saturday and Sunday Night all request radio shows or Fred Hall’s Saturday big band program. Clark said the station will continue airing its weekend health shows, Martha Stewart segments and “Nevada Matters.”

At first, KSRN will be completely automated, but Clark said she plans to add a live show --- probably during the morning --- in a couple of weeks. She said no decision has been made about the announcer for the show.

<article>

Best of Reno

Personalities Editor's Choice

Best axed radio commentator

**David Farside
Reno News & Review
December 21, 2000**

When KSRN radio took David Farside's 90-second commentary off the air, it demonstrated just how tenuous a foothold the First Amendment has in Reno. Champion Chevrolet pulled its sponsorship of "Farside Fodder" shortly after the Sparks activist criticized John Ascuaga's Nugget for charging \$2 for soft drinks during the rib cook-off, the Reno Gazette-Journal reported. Without a sponsor, the station yanked Farside. In the past, Farside has criticized Ascuaga for moves such as lobbying against a room tax hike, a position that has Sparks officials instead seeking a property tax increase to fund needed municipal services. By pointing out the influence of special interests over local politicians, Farside is a credit to journalism. KSRN should be embarrassed for not doing more to keep him on the air. But sadly, in this day and age of sanitized programming by corporate-owned radio stations, potential profit margins tend to win out over free speech every time.

<article>

LOCAL RENO, NEVADA NEWS STORIES

How Ira Hansen got the boot

As talk show host at KKOH, he had nearly complete freedom of speech -- until he questioned U.S. foreign policy in Israel

**By Deidre Pike
Reno News and Review
October 4, 2001**

Getting canned after spending five years in the radio talk show host biz isn't Ira Hansen's biggest gripe. What worries the conservative Republican the most is the censorship of political discussion -- especially in this time of national crisis, when having access to the marketplace of ideas is arguably more important than ever.

"This issue is so critical right now," Hansen says. "If we're ever going to solve problems in the Middle East, we have to be able to have open dialogue about it. The smear tactics of using economic blackmail and using terms like 'anti-Semitism' toward those who bring the issues up -- that stifles competition."

For five years, listeners could catch Hansen's Saturday call-in show at KKOH-AM 780 at 11 a.m. -- an hour after *Garden Talk Line* with Mr. Vegetable. Hansen was fired on Sept. 15. KKOH station manager Dan Mason says the station can't comment on personal issues. Hansen, owner of a Sparks plumbing outfit called Ira Hansen & Sons, says he lost the radio gig after a local casino owner threatened to pull its advertising with Citadel Communications Corp., the stations's parent company.

"The whole story is that they made a story out of nothing," Hansen says. "I didn't see anything rude or that wasn't factual. ... This completely stunned me. I didn't see it coming."

In the days after the attacks of Sept. 11, Hansen was asked to do a 3 1/2 hour program for KKOH. He'd introduce a controversial topic, as usual, and take calls from listeners.

For Hansen, it seemed a golden opportunity to talk about issues that worried him personally -- like the threat of war. After all, Hansen, 40, is the father of eight children. His oldest son, Daniel Alexander Hansen, 19, was student body president at Manogue High School, lettered in three sports and maintained a 4.0 GPA. The teen now attends Brigham Young University on a scholarship.

"In short, he's just the all-American kid," Hansen says. "And the last thing I want to see is that kid fighting in some hellhole in Afghanistan because of our country's blind relationship with Israel."

Hansen had used his radio show to talk about issues in the Middle East before. He'd done his homework. When Ariel Sharon was to become prime minister of Israel, Hansen did a show on what that might mean for peace in the Middle East. To truly address terrorism, Hansen says, it's critical to look at its roots. He traces these roots back to the conflict in the Middle East.

"It's not that [radical Muslims] don't like our Western way of life," he says. "Then they'd hate Germany and France, too. The reason we have this complete hatred of Americans is Israel. Until we rectify that, we'll never have decent relationships with the rest of the world. You can kill Osama [bin Laden], and 10 more will pop up, because they'll make a martyr out of him. ... WE'll never have peace unless there's parity between the Muslim/Arab world and Israel."

It helps to know a bit about the mindeast of the Israeli prime minister. As Israel's defense minister in 1982, Sharon was held indirectly responsible for the slaughter of 2,000 Palestinians at refugee camps in Beirut. The Israeli Commission of Inquiry recommended then that Sharon resign. He did.

Time passed. Nowadays, as the newly elected prime minister of Israel, Sharon seeks to achieve his stated goal of "security and peace" by ordering plenty of helicopter attacks and the bombing of buildings in the Gaza area.

In a recent article in The Nation, Neve Gordon writes that since Sharon came to power, "Tank and infantry units have entered Beit Jala and Jenin, and Israeli death squads operate regularly in Talkarm, Hebron and Ramallah. ... Palestinians have been under siege for months, and their economy has all but collapsed, leaving thousands to cope with grinding poverty. The extensive restrictions on freedom of movement have not only prevented Palestinians from reaching hospitals and work but have also cut off access to drinking water in 218 West Bank villages."

The United States continues to back Israel, giving the nod to the nation's questionable tactics and sending it the lion's share of U.S. foreign aid, Hansen says.

"Israel totally abuses the rights of the indigeneous people that live in that area and forces Jewish settlements into places that aren't legally part of Israel," he says. "It's a horrible injustice against these people, and it has not been rectified."

When Hansen first introduced the topic of U.S. foreign policy toward Israel on his how -- months before the events of Sept. 11 -- many irate listeners began to call the station, he says, including the Jewish Defense League and Atlantis Casino owner John Farahi.

Hansen says the station's management told him that he could only talk about Israel in a positive way.

"If Israel was the bad guy, then they didn't want me talking about it," Hansen says. "That was the only time KOH asked me not to talk about a specific topic."

Farahi told the RN&R that he had no comment regarding Hansen's story. The Jewish Defense League doesn't have an office in Reno. And while Rabbi Myra Soifer of Temple Sinai-Reform in Reno says she isn't familiar with Hansen's show, she says that it would be too simplistic to attribute the terrorist attacks to Israel.

"I'm not crazy about Ariel Sharon -- I don't agree with all of his policies -- but it's nonsense to say that this isn't about anti-Westernism," Soifer says. "There's a much larger context that has to do with problems [some have] with the West and democracy."

Why did Hansen decide to ignore his boss's directive and again bring up issues in Israel?

"After [the] terrorist attack, I listened to talk radio extensively and was appalled by the sentiments being expressed, especially by syndicated KOH host Mike Savage," Hansen wrote in a Sparks Tribune column that ran Sept. 23. **(PERSONAL NOTE: Mike Savage is a syndicated Talk Show out of San Francisco, California.)** "Savage, who is Jewish, was calling for all-out war against all Islamic and Arab nations in the Middle East, openly naming Lybia, Iran, Iraq, Syria, Afghanistan and several others. He was totally in earnest, speaking of the need to, in effect, wipe all Muslims off the Earth. ... I was disgusted, and when my Saturday [radio] show came up, my entire focus was on combating this blind and vengeful hatred against all Muslims and Arabs."

So Hansen talked about Israel. And Farahi's name came up briefly in response to a caller who was asking about the dimming of lights at local casinos.

The woman kept on talking. The show went on. Then about two hours later, Hansen says, his boss burst into the studio.

"He said, 'You're in deep shit. John Farahi called and he's threatening to pull his advertising. You're in deep shit.' And he slammed the door," Hansen recalls.

After the show, Hansen sat in his boss's office while calls flew back and forth. Hansen told his boss, "You and I know what'll happen if it comes to keeping a local yokel talk show and keeping advertising."

Hansen's suspension was immediate. He was fired 15 minutes later, after he'd left the building, via cell phone. He says he won't mind having Saturdays to spend with his family, but that's not the point.

"I'd like to see anyone show where Mr. Hansen has done something that's anti-Jewish," he says. "It's not the case. I'm not bigoted against Jews in any way, shape or form."

Hansen, in fact, prides himself on being an independent thinker.

"I'm just as harsh with Republicans as I am with Democrats," he says. "If somebody does something right, I'll praise him. If he's doing something badk, I'll blast him with both barrels regardless of ideological orientation."

NextMedia got rid of an announcer because he gave his opinion of a local function. NextMedia wouldn't look for another sponsor, because most other sponsors wouldn't pay as much as Champion Chevrolet. Money blinds content.

NextMedia executive stated that they tried to keep KSRN on the air, but failed because it wasn't making money. So, they changed the night format of KSRN in the Spring of 2001 and made them play more music in the daytime that matched the night-time satellite format, which was a narrowed version of what they used to play. Loss of income by tinkering.

Looking at the ARBITRON ratings, KSRN was doing better in general with people 75+, than other stations aiming at the younger population, and should have said how well KSRN was really doing. But since NextMedia forced them to change their range of music - to make a better audience - Arbitron went even further down so they decided to change the station's format overall, no worry - though they state differently - of the elder population.

My talk with a [temporary] night-time announcer was that NextMedia had been trying to get KSRN to change the format [almost] since they purchased it, but Lou Gutenberger, Jack Slothower and Bob Carroll, fought hard to keep the format since they were not at all interested in 'money' over 'content' ... they had been surviving reasonably well since they came back on the air in 1992. (He had also been at the station initially for more than three years before moving to New York for several years.) The group of them WANTED to play for the OLDER crowd. NextMedia didn't want that. So long KSRN.

John Farahi is of the Jewish nationality. So when Ira Hansen spoke about Israel in a manner opposite of what Citadel wished him to do, it not only irked Citadel, but John Farahi as well. Ira has had many calls before on his talk-show complaining about what he has commented on, but Citadel waved the complaints as it was a 'right' to bring up both sides of the story. But bring it up where that person [also] owns a big income generating place, and you get the boot.

When a business wishes to buy into a local market, normally their petition is reviewed by the City Council, Planning Commission, County Commissioners, and - depending on the size of the project - often a/several public hearing (s). If the business is small, it is usually at the bay of the forementioned reviews. Waltz in "WalMart" - as we have in several towns in this part of Nevada - who wants to build ANOTHER store only a couple of miles from an existing one, should the public overwhelmingly disagree by 5-1 and the commission turn down the application, just threaten to sue (and have the money to do so over the local government's pocketbook), and you win anyway.

When Congress allowed such massive ownerships of stations by conglomerates, they gave the "WalMart" power to such conglomerates,

with the FCC essentially only being allowed to 'rubber-stamp' the deal up to the proposed limits. The local factor lost diversity and public interest.

(Thank you automation and satellite/network broadcasting), more 'conglomerates' are instituting the forementioned equipment, ridding the local 'feel' and interaction between the public and station(s). ("The high today is expected to be around ??", goes the announcer, who recorded it for the 3pm - 7pm shift ... the announcement is on at 6:40pm, the high had already passed at 3:25pm.; no traffic or time announcements ... it could be snowing and no one will state such since it wasn't earlier in the day with the voice-track was laid out.) The money is going somewhere, but it is NOT going into the local economy since there are few being paid anymore so to put the money out.

We now have conglomerates who tell local stations what they will / will not air, even if it is in the local interest to air something otherwise. (Emergency service notwithstanding, normally.)

Large conglomerations are dictating what technology is to be pushed. (When FM Stereo came out, it was ordered to be compatible with FM Mono. When AM Stereo came out, it was to be compatible with AM Mono. When Clear Channel, Citadel, ABC/Disney, AMFM Inc, and others decided that THEY did not want AM Stereo ... instead going for IBOC ... it was NOT decided to make IBOC compatible with AM Stereo, rendering a HUGE amount of equipment owned by [smaller/independent] broadcasters and consumers alike, obsolete.)

(Again also, noting the 8+ years it took for the FCC to decide which technology would be adopted which also caused many smaller stations that had adopted equipment such as the KAHN/Hazeltine to not want to switch to C-Quam, to know that they may have to dump that as well if no support was to be had due to the conglomerates pulling plugs.)

There are MANY, MANY more points I'd like to bring out concerning the loss of diversity in programming and public interest. But as noted, this must be submitted very shortly.

To summarize what I have mentioned, I would believe that the rule change 202(b) is ineffective if it pertains to 'numerical limits only', and with 'numerical limits address diversity only', if the transmitter sites and power ratings can reasonably reach into a community, no matter where the 'city of registration' is located at for the station. The rules give a VERY lucrative ownership allowance for a market.

My opinion as well, is that the 'maximum' allowance for a conglomerate in a market be dropped by at least two stations, with exceptions made to ultra-small markets that may only be able to support a very minimal media of - say - 4 or less stations.

Respectfully submitted,

Gregg E. Zuelke